

Kimberly B. Turner, et al. v. City of Oklahoma City, et al.
Deposition of DOUGLAS LEE GRADY

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

COPY

KIMBERLY B. TURNER, as)
Personal Representative of)
the Estate of ROBIN)
LEANDER HOWARD, deceased,)

Plaintiff,)

vs.)

No. CIV-14-112-W

THE CITY OF OKLAHOMA CITY,)
OKLAHOMA; JEFF COFFEY,)
individually and in his)
official capacity as a)
police officer; DOUGLAS)
GRADY, individually and in)
his official capacity as a)
police officer; and BILL)
CITTY, individually and in)
his official capacity as)
Chief of Police,)

Defendants.)

DEPOSITION OF DOUGLAS LEE GRADY
TAKEN ON BEHALF OF THE PLAINTIFF
IN OKLAHOMA CITY, OKLAHOMA
ON OCTOBER 2, 2015

REPORTED BY: KATHY FOREMAN, CSR #190

Verbatim Reporting, LLC
Phone 405-232-8100 Fax 405-606-8767

Kimberly B. Turner, et al. v. City of Oklahoma City, et al.
Deposition of DOUGLAS LEE GRADY

Page 11

1 and it's hard to have a photographic memory of
2 it. Would that be fair?

3 A Yes, sir.

4 Q And you were able to get his -- get in
5 contact with his wrist, and you were able to
6 bring his hand behind his back?

7 A Eventually.

8 Q Okay. What happened in between the
9 time that you made contact with his wrist and
10 the moment you actually got it behind his back?

11 A I gave verbal commands to give me his
12 hand and place it behind his back. He drew his
13 hand, tried to draw it farther underneath him.
14 It was in a downward angle, towards his
15 waistband. I delivered a strike -- quick strike
16 pressure with my left knee at Mr. Howard's
17 buttocks, to access his sciatic nerve, to gain
18 compliance, by creating a temporary reflexive
19 inhibition.

20 Q Is that painful to a person that you
21 do that to?

22 A I can't gauge another person's
23 threshold as far as pain or discomfort goes.

24 Q Have you ever had that done to you?

25 A Yes, sir, I have.

Kimberly B. Turner, et al. v. City of Oklahoma City, et al.
Deposition of DOUGLAS LEE GRADY

Page 13

1 Q And the part of your body that was in
2 contact with him was your knee?

3 A I don't understand exactly. Could you
4 rephrase?

5 Q Well, I'm not -- I want to know how
6 you were applying your body weight. You weren't
7 lying down on the guy, were you?

8 A No, sir.

9 Q How were you applying your body
10 weight?

11 A Straight down on the back of his right
12 thigh.

13 Q And that would be with your knee?

14 A That would be with basically my core,
15 my torso.

16 Q Okay. And I think you said he tried
17 to pull his hand down, and I take it since you
18 had ahold of his wrist, he wasn't successful.
19 You were able to overcome and pull his hand out?

20 A No, his hand was already underneath
21 him. Whenever I straddled his leg, his hand was
22 underneath him, reaching into his waistband
23 area. I grabbed ahold of his wrist and ordered
24 him to give me his hands; at which point he
25 didn't and tried to draw it further underneath

Kimberly B. Turner, et al. v. City of Oklahoma City, et al.
Deposition of DOUGLAS LEE GRADY

Page 14

1 him. I felt his arm tense, so I delivered quick
2 strike pressure to the buttocks to access that
3 sciatic nerve, which was successful. At that
4 point I was able to retrieve his hand from
5 underneath him and place it behind his back.

6 Q Were you able to get his right hand
7 behind his back before your fellow officer was
8 able to get his left hand behind his back?

9 A I don't recall exactly which hand got
10 back there first. I think it was about the same
11 time or a small time difference between the two.

12 Q Which of you actually applied the
13 cuffs?

14 A I believe Sgt. Coffey applied the
15 cuffs.

16 Q And was it Sgt. Coffey's cuffs that
17 were used?

18 A Yes, sir.

19 Q Were there any other officers on the
20 scene at this point?

21 A Sgt. Anderson and Sgt. Bell were on
22 the scene.

23 Q Sgt. Bell was your partner; is that
24 correct?

25 A Yes, sir.

Kimberly B. Turner, et al. v. City of Oklahoma City, et al.
Deposition of DOUGLAS LEE GRADY

Page 78

1 A No, sir.

2 Q Thank you, sir. I have no further
3 questions.

4 CROSS-EXAMINATION

5 BY MS. WARREN:

6 Q When you were on the scene following
7 this incident, did you have any conversations
8 with any of Mr. Howard's family members?

9 A Yes, sir, I did.

10 Q Who did you speak to?

11 A I spoke to a lady that I later
12 believed to be his mother.

13 Q Did you also believe that she was the
14 owner of the vehicle that Mr. Howard was driving
15 that day?

16 A Yes, ma'am.

17 Q What did you say to her?

18 A She arrived on scene, asking me about
19 the vehicle. I told her that it had just been
20 involved in a vehicle pursuit with officers. At
21 which point, she asked who was driving. I had
22 learned the subject's name was Robin. I told
23 her, "Robin." I believe she said that that was
24 her son.

25 Then she asked me how to get her car

Kimberly B. Turner, et al. v. City of Oklahoma City, et al.
Deposition of DOUGLAS LEE GRADY

Page 79

1 out of impound.

2 Q Did you ever tell her that her son was
3 going to be taken into custody?

4 A I told her he was going to jail.

5 MS. WARREN: No further questions.

6 MR. BERKOWITZ: I have no further
7 questions.

8 MS. KNIGHT: He'll read and sign.

9 (Concluded at 3:15 p.m.)
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25